

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Carrier Current Systems, including)	ET Docket No. 03-104
Broadband over Power Line Systems)	
)	ET Docket No. 04-37
Amendment of Part 15 Regarding New)	
Requirements and Measurement)	
Guidelines for Access Broadband over)	
Power Lines Systems)	

REPLY COMMENTS OF THE UNITED POWER LINE COUNCIL

Pursuant to Section 1.415 of the Federal Communications Commission (“FCC”) Rules, the United Power Line Council (“UPLC”) hereby submits its reply comments in response to the Commission’s Public Notice in the above-referenced proceeding.¹ The record reflects overwhelming support for UTC to serve as the access BPL database manager. UPLC reiterates its support for UTC and echoes the comments of other parties that also support UTC as the database manager.

The comments on the record uniformly recognize UTC’s qualifications to serve as the database manager. Motorola notes UTC’s experience with the power line carrier database and in coordinating private

¹ *OET Seeks Comment on Proposal by United Telecom Council to Serve as Database Manager for Access Broadband over Power Line Systems*, ET Docket No. 04-37 Public Notice, 2005 WL 1364529 (“Public Notice”).

land mobile facilities.² Current Technologies and Current Communications added that UTC also possesses “close knowledge of the electric distribution business.”³ Given that UTC has already designed and tested the BPL database, APPA concludes that designating UTC to serve as the database manager will spur the development and effective management of the database.⁴ The UPLC agrees with these comments, and believes that UTC is amply qualified to serve as the Access BPL database manager.

Moreover, the comments on the record generally recognize that UTC is well-positioned to serve as the Access BPL database manager. Motorola recognizes that UTC is the association for the telecommunications and information technology interests of electric, gas and water utilities and other critical infrastructure industries.⁵ It also acknowledges UTC’s leadership in the BPL industry through the UPLC. Meanwhile, APPA notes that UTC has worked with the FCC, NTIA and other organizations representing radio users in the high-frequency band.⁶

² Comments of Motorola in ET Docket No. 04-37 at 2 (filed June 27, 2005)(“Comments of Motorola”).

³ Comments of Current Technologies, LLC and Current Communications, LLC at 2 (filed June 27, 2005)(“Comments of Current Technologies, et al.”).

⁴ Comments of the American Public Power Association at 3 (filed June 27, 2005)(“Comments of APPA”).

⁵ Comments of Motorola at 2.

⁶ Comments of APPA at 3.

UPLC agrees with these comments that UTC is well-positioned to serve as the Access BPL database manager, and urges the FCC to designate UTC as the Access BPL database manager, which will promote the speedy implementation and effective management of the Access BPL database.

UPLC reiterates that UTC's position among the stakeholders should promote its ability to carry out its administrative duties as the Access BPL database manager. UTC has designed the database to provide effective public notice about BPL deployments in compliance with the FCC information disclosure requirements. It has also designed it to be as transparent and simple to use as necessary. Moreover, as the FCC explained, the database manager need not be an independent third-party, because it has limited duties that are administrative in nature. Therefore, UPLC agrees with Current Technologies and Current Communications that it is "confident that UTC will ably execute the responsibilities assigned to the database coordinator."⁷

WHEREFORE, THE PREMISES CONSIDERED, UPLC is pleased to provide its reply comments supporting UTC to serve as the Access BPL database manager.

Respectfully submitted,

UPLC

By: _____

⁷ Comments of Current Technologies, et al. at 2.

Brett Kilbourne
Director of Regulatory Services
and Associate Counsel

1901 Pennsylvania Avenue, NW
Fifth Floor
Washington, D.C. 20006

(202) 872-0030

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